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10 CFR 52.99(c)(1)

U.S. Nuclear Regulatory Commission  
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Washington, DC 20555-0001

Southern Nuclear Operating Company  
Vogtle Electric Generating Plant Unit 3  
ITAAC Closure Notification on Completion of ITAAC C.2.6.09.03a [Index Number 660]

Ladies and Gentlemen:

In accordance with 10 CFR 52.99(c)(1), the purpose of this letter is to notify the Nuclear Regulatory Commission (NRC) of the completion of Vogtle Electric Generating Plant (VEGP) Unit 3 Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Item C.2.6.09.03a [Index Number 660]. This ITAAC confirms that isolation zones exist in outdoor areas adjacent to the physical barrier at the perimeter of the protected area and allow 20 feet of observation and assessment of the activities of people on either side of the barrier. The closure process for this ITAAC is based on the guidance described in Nuclear Energy Institute (NEI) 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52," which was endorsed by the NRC in Regulatory Guide 1.215.

This letter contains no new NRC regulatory commitments. Southern Nuclear Operating Company (SNC) requests NRC staff confirmation of this determination and publication of the required notice in the Federal Register per 10 CFR 52.99.

If there are any questions, please contact Kelli Roberts at 706-848-6991.

Respectfully submitted,



Michael J. Yox  
Regulatory Affairs Director Vogtle 3 & 4

Enclosure: Vogtle Electric Generating Plant (VEGP) Unit 3  
Completion of ITAAC C.2.6.09.03a [Index Number 660]

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**Southern Nuclear Operating Company  
ND-21-0926  
Enclosure**

**Vogtle Electric Generating Plant (VEGP) Unit 3  
Completion of ITAAC C.2.6.09.03a [Index Number 660]**

## **ITAAC Statement**

### **Design Commitment**

3.a) Isolation zones exist in outdoor areas adjacent to the physical barrier at the perimeter of the protected area that allows 20 feet of observation on either side of the barrier. Where permanent buildings do not allow a 20-foot observation distance on the inside of the protected area, the building walls are immediately adjacent to, or an integral part of, the protected area barrier.

### **Inspections/Tests/Analyses**

Inspections will be performed of the isolation zones in outdoor areas adjacent to the physical barrier at the perimeter of the protected area.

### **Acceptance Criteria**

Isolation zones exist in outdoor areas adjacent to the physical barrier at the perimeter of the protected area and allow 20 feet of observation and assessment of the activities of people on either side of the barrier. Where permanent buildings do not allow a 20-foot observation and assessment distance on the inside of the protected area, the building walls are immediately adjacent to, or an integral part of, the protected area barrier and the 20-foot observation and assessment distance does not apply.

## **ITAAC Determination Basis**

An inspection of the isolation zones in outdoor areas adjacent to the physical barrier at the perimeter of the protected area was performed to verify that isolation zones exist in outdoor areas adjacent to the physical barrier at the perimeter of the protected area and allow 20 feet of observation and assessment of the activities of people on either side of the barrier and satisfy the applicable protected area perimeter physical barrier isolation zone requirements of the VEGP Unit 3 and Unit 4 Physical Security Plan associated with 10 CFR 73.55(e)(7)(i)(A). The VEGP Unit 3 Plant Security System ITAACs only cover the Unit 3 plant security system design commitment scope.

Where permanent buildings do not allow a 20-foot observation and assessment distance on the inside of the protected area, the building walls are immediately adjacent to, or an integral part of, the protected area barrier and the 20-foot observation and assessment distance does not apply. In the case of VEGP Unit 3 a point on both the Personnel Access Point (Building 304) east and west exterior walls intersects and is immediately adjacent to the protected area perimeter physical barrier. The protected area perimeter physical boundary continues through the inside of Building 304 between the building's east and west exterior walls and is monitored with intrusion detection. The Building 304 roof is monitored by a perimeter intrusion detection system and security cameras and is only accessible from inside the protected area. Following protected area declaration, the interior of Building 304 will be monitored by security cameras and a continuously manned Bullet Resisting Enclosure. Building 304 is the personnel access control portal to the VEGP Unit 3 protected area. There are no other permanent buildings at VEGP Unit 3 that are immediately adjacent to, or an integral part of, the VEGP Unit 3 protected area perimeter physical barrier.

An inspection was performed as described in ITAAC Technical Report SV3-SES-ITR-800660 (Reference 1) and measured, using a commercially available measuring device, the isolation zone observation and assessment distance in outdoor areas that are adjacent to either side of the protected area perimeter physical barrier. The measurements verified that a minimum 20-foot observation and assessment distance exists on either side of the protected area perimeter physical barrier. The inspection also visually confirmed that the isolation zone observation and assessment distances

measured above are clear of objects which could conceal or shield the activities of people on either side of the protected area perimeter physical barrier. Lastly, the inspection visually verified that the Building 304 east and west exterior walls intersect, and are immediately adjacent to, the protected area perimeter physical barrier.

The results of the inspection are documented in Reference 1 and verify that isolation zones exist in outdoor areas adjacent to the physical barrier at the perimeter of the protected area and allow 20 feet of observation and assessment of the activities of people on either side of the barrier. Where permanent buildings do not allow a 20-foot observation and assessment distance on the inside of the protected area the inspection results verify that the building walls are immediately adjacent to, or an integral part of, the protected area barrier.

Reference 1 is available for NRC inspection as part of the Unit 3 ITAAC C.2.6.09.03a Completion Package (Reference 2).

#### **ITAAC Finding Review**

In accordance with plant procedures for ITAAC completion, Southern Nuclear Operating Company (SNC) performed a review of all findings pertaining to the subject ITAAC and associated corrective actions. This review found there were no relevant ITAAC findings associated with this ITAAC. The ITAAC completion review is documented in the ITAAC Completion Package for ITAAC C.2.6.09.03a (Reference 2) and is available for NRC review.

#### **ITAAC Completion Statement**

Based on the above information, SNC hereby notifies the NRC that ITAAC C.2.6.09.03a was performed for VEGP Unit 3 and that the prescribed acceptance criteria were met.

Systems, structures, and components verified as part of this ITAAC are being maintained in their as-designed, ITAAC compliant condition in accordance with approved plant programs and procedures.

#### **References (available for NRC inspection)**

1. SV3-SES-ITR-800660, Unit 3 ITAAC 660 Walkdown Inspection: ITAAC C.2.6.09.03a, Rev 0 (SRI)
2. C.2.6.09.03a-U3-CP-Rev0, ITAAC Completion Package